

Colorado Department of Health
Hazardous Materials & Waste Management Division

Comments

on

FINAL

PHASE I RFI/RI WORK PLAN

ROCKY FLATS PLANT

SOLAR EVAPORATION PONDS

(OPERABLE UNIT NO.4)

and the

RESPONSES TO COLORADO DEPARTMENT OF HEALTH

AND

U. S. ENVIRONMENTAL PROTECTION AGENCY

COMMENTS

JANUARY, 1992

=====

COMMENTS TO THE WORKPLAN:

General Comments:

Although upgradient groundwater monitoring wells are no longer proposed as Phase I activities, references to these wells are still contained in Section 4. See the following references:

- o First paragraph, page 2,
- o First paragraph, page 5,
- o Fourth bullet, page 6,
- o Second paragraph of Section 4.2.2, page 8, reference is to ground water samples.

Specific Comments:

Section 5.3.1: The first bullet item of page 4 should include the words "surficial soil sample" following the word "long".

Section 7.0: In the first paragraph, page 2, the development of the project-specific Health & Safety Plan, at a later date, is of concern. DOE must ensure that this plan is developed in timely fashion to prevent any further delay in commencement of investigation activities.

Section 7.3.1: The fourth paragraph, page 9, describes a alpha screening process not described in EMD.OP (SOP) FO.14. Either a DCN should be used to update FO.14 or a SOP addendum should be provided to fully describe the proposed approach. This discussion should include the time span of each measurement to ensure that data are reliable and representative of actual activity levels.

Section 7.3.2: In the first paragraph, page 11, DOE states that "a detailed work plan will be developed as a work element within the OU-4 Phase I RI/RFI effort...." for vadose zone investigations. This is acceptable; however, the Division expects DOE to provide a delivery date for this technical memorandum. Coordination with related field activities is required to assure that the opportunity to conduct vadose zone monitoring is not missed.

Section 7.3.4.3: The reference to Figure 7-4 is incorrect; the reference should be to Figure 7-3.

Table 7-5: The locations of the radiological surveys are shown on Figure 7-1, not Figure 7-2 nor Figure 7-3.

COMMENTS TO THE "RESPONSES" DOCUMENT:

General Comments:

DOE's responses to the following Colorado Department of Health comments have not resulted in modifications to the originally referenced text as suggested in each response:

CDH-S1: Reference to soil sampling results is still missing.

CDH-S3: Per the response, and the Historical Release report, Pond 207B North's asphalt planking was removed and relined with asphaltic concrete; however, paragraph three, page 6, Section 2 continues to state that this liner was not removed, but was repaired.

CDH-S8: The replacement of direct contact with dermal contact was not made.

Replacement pages should be prepared to address these specific oversights.

Specific Comments:

CDH-S19: Doe has not responded to the portion of the question concerning scheduling impacts if the Solar Ponds are not cleaned in time to allow completion of all RFI/RI activities. Again, what is DOE's intent, or plan, if this should occur?

EPA-S3: The response refers to "attached records" that should be used to amend Appendix B. Where were these records attached? The Division has been unable to locate them among the materials submitted.